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DISTRICT COURT
DISTRICT OF MASS.
**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**MARC THOMIS and
CHARLES ROBERTS**

Plaintiffs,

v.

**BRAZIL AMAZON TRADING, INC.,
BRAZIL AMAZON RESOURCES, INC.,
AND BRUNILDA OBUHOSKY,
Individually**

Defendants.

**Civil Action No.:
1:05-CV-11812-WGY**

**DEFENDANTS' OPPOSITION TO PLAINTIFFS' REQUEST
FOR ENTRY OF DEFAULT PURSUANT TO FED. R. CIV. P. 55(a)**

Defendants Brazil Amazon Trading, Inc., Brazil Amazon Resources, Inc. and Brunilda Obuhosky (collectively "Defendants") hereby oppose Plaintiffs' Request for Entry of Default Pursuant to Fed. R. Civ. P. 55(a). As grounds for this Opposition, Defendants state as follows:

1. The Court's Order of October 18, 2005 denied Defendants' Motion for Stay and to Compel Arbitration "without prejudice to its renewal upon compliance with the Local Rules."
2. Defendants were out of the Country from late October through early November and, therefore, did not receive the Court's Order dated October 18th until just recently. On November 17, 2005, Defendants retained Alexander Furey, Esq. of Furey & Associates LLC to represent it in the above-captioned dispute. The next day, on

November 18, 2005, Alexander Furey, Esq. filed a Notice of Appearance and a Renewed Motion for Stay and to Compel Arbitration.

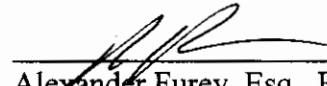
3. Given that Defendants have now complied with the Local Rules and have renewed their Motion for Stay and to Compel Arbitration, Plaintiffs Request for Entry of Default Pursuant to Fed. R. Civ. P. 55(a) should be denied.

WHEREFORE, for the reasons stated above, Plaintiffs' Request for Entry of Default Pursuant to Fed. R. Civ. P. 55(a) should be DENIED.

Respectfully submitted by Defendants,

**BRAZIL AMAZON TRADING, INC.,
BRAZIL AMAZON RESOURCES, INC.
and BRUNILDA OBUHOSKY, Individually**

By their attorney,




Alexander Furey, Esq., BBO#634157
Furey & Associates, LLC
28 State Street, Suite 1100
Boston, MA 02109
Tel. 617-573-5114
Fax 617-573-5115

DATED: November 18, 2005

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of *Defendants' Opposition to Plaintiffs' Request for Entry of Default Pursuant to Fed. R. Civ. P. 55(a)* was served by U.S. Mail this 18th day of November, 2005 upon the following:

Richard Thomas Davies, Esq.
26 Turtle Cove Road
Sandwich, Massachusetts 02537



Alexander Furey, Esq.